

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

JAMES M. BAKER, On Behalf of Himself and All Others Similarly Situated,	)	Civil Action No. 1:05-cv-00272-GMS
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
MBNA CORP., et al.,	)	
	)	
Defendants.	)	
	)	
ROCHELLE PHILLIPS, On Behalf of Herself and All Others Similarly Situated,	)	Civil Action No. 1:05-cv-00277-GMS
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
MBNA CORP., et al.,	)	
	)	
Defendants.	)	
	)	

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MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND  
FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL

**JULY 5, 2005**

ROBERT WILKINS, Individually and On Behalf of All Others Similarly Situated,	)	Civil Action No. 1:05-cv-00287-GMS
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
MBNA CORP., et al.,	)	
	)	
Defendants.	)	
	)	
LEONARD BRONSTEIN, On Behalf of Himself and All Others Similarly Situated,	)	Civil Action No. 1:05-cv-00289-GMS
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
MBNA CORP., et al.,	)	
	)	
Defendants.	)	
	)	
GREG PENN,	)	Civil Action No. 1:05-cv-00293-GMS
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
MBNA CORP., et al.,	)	
	)	
Defendants.	)	
	)	
CLIFFORD W. JONES, On Behalf of Himself and All Others Similarly Situated,	)	Civil Action No. 1:05-cv-00316-GMS
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	
vs.	)	
	)	
MBNA CORP., et al.,	)	
	)	
Defendants.	)	
	)	

[Caption continued on following page.]

MICHAEL D. BLUM,	)	Civil Action No. 1:05-cv-00372-GMS
	)	
Plaintiff,	)	<u>CLASS ACTION</u>
	)	
vs.	)	
	)	
MBNA CORP., et al.,	)	
	)	
Defendants.	)	
	)	
	)	

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Class member City of Deerfield Beach Non-Uniform Employees Retirement Plan (“City of Deerfield Beach”), will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing City of Deerfield Beach as Lead Plaintiff; (iii) approving City of Deerfield Beach’s selection of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and the law firm of Rosenthal, Monhait, Gross & Goddess, P.A. to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, City of Deerfield Beach submits herewith a Memorandum of Law and Declaration of Jeffrey S. Goddess dated July 5, 2005.

DATED: July 5, 2005

ROSENTHAL, MONHAIT, GROSS  
& GODDESS, P.A

  
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JEFFREY S. GODDESS (Del. No. 630)  
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[Proposed] Lead Counsel for Plaintiffs

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